



# Procurement Policy

## Responsibly Sourced Minerals Policy

Document #: PL_PROCo05_CIA					
REV	DATE	CHANGE	CREATED/MODIFIED BY	VERIFIED BY	APPROVED BY
00	2019-05-31	Initial Issue	David R	Legal	Mike M
01	2019-06-13	Update	Ridha D	Mark G	Mike M
02	2019-12-06	Adding process flow Section	Rasy S	Ridha D	Mike M

## About this policy

The Company is committed to the responsible sourcing of minerals, and its suppliers must conduct their business in accordance with the CIARA RBA Supplier Code of Conduct<sup>1</sup> (the “Code of Conduct”), and in particular, in compliance with applicable laws and regulations regarding conflict minerals in order to ensure an ethical and sustainable mineral supply chain.

Conflict minerals refers to tantalum, tin, tungsten, gold (typically referred to as “3TG” conflict minerals), and cobalt, mica, lithium, copper, nickel and rare earth elements.

While the Company does not directly procure 3TG minerals, some of our suppliers use minerals from multiple sources worldwide.

The Company seeks to ensure that its suppliers conform with the Code of Conduct and its Responsibly Sourced Minerals Policy, and that they extend these expectations to their own suppliers as “suppliers” includes not only the Company’s directly suppliers but also their subsidiaries and subcontractors.

Suppliers should maintain appropriate documentation and records to ensure regulatory compliance and due diligence on the source of 3TG minerals throughout the supply chain including as applicable, smelters and refiners, and to provide this information to the Company on a regular basis. This information will be made available to Ciara customers.

In addition to applicable legal requirements, the Company’s suppliers confirm that they (1) neither directly or indirectly finance armed groups in conflict-affected regions; and (2) neither tolerate or contribute to human rights abuses that include forced or child labour and environmental degradation.

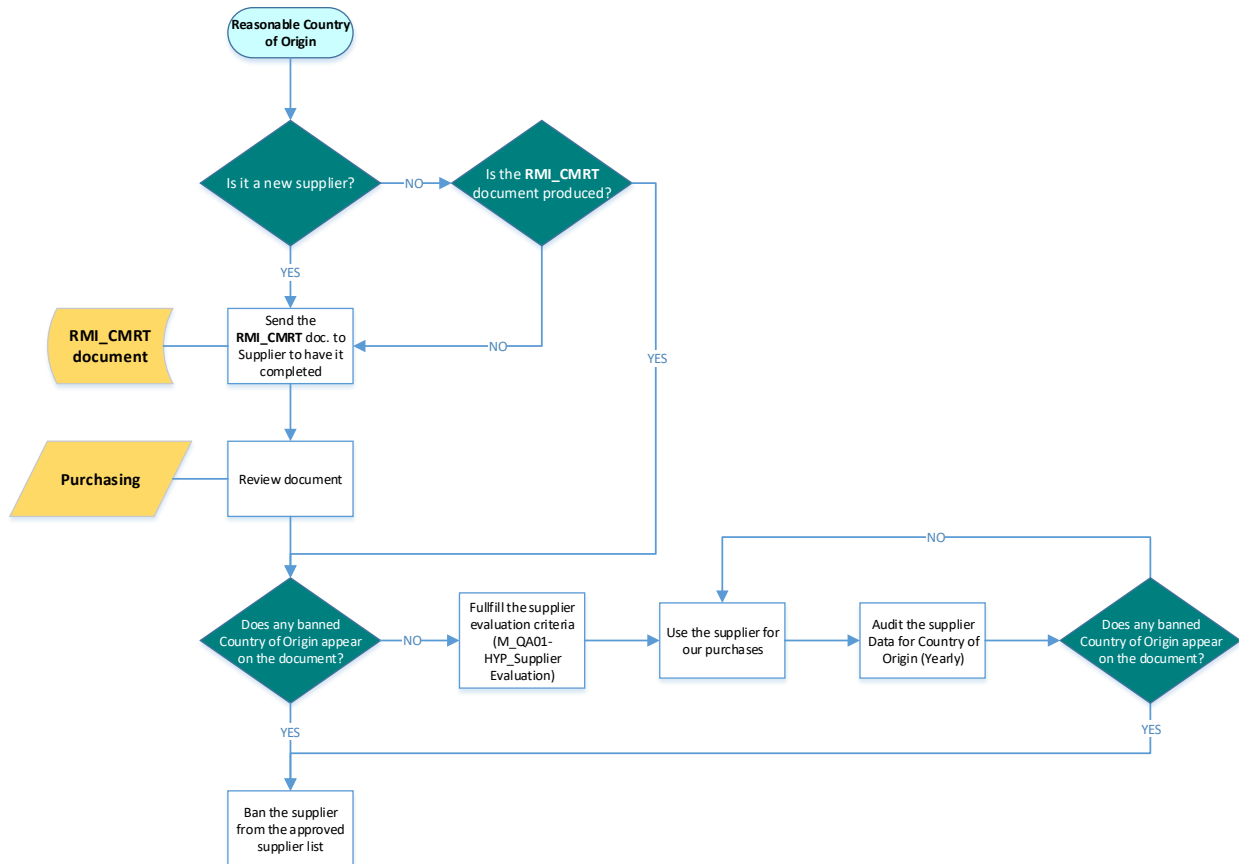
The Company’s suppliers must demonstrate their commitment to responsible mineral sourcing from regions in which specific mining operations may present risk. As part of their commitment, suppliers must establish and maintain due diligence frameworks and management systems, including appropriate management and worker training programs.

All suppliers are subjected to our RCOI inquiry before obtaining the right to do business with Ciara. All suppliers are audited on a yearly basis. The results are reviewed with our Executive Vice-president of Procurement. Any non-compliance will cause a supplier to be banned from our preapproved supplier list.

---

<sup>1</sup> The CIARA RBA Code of Conduct is based on the Responsible Business Alliance (RBA) Code of Conduct.

All the suppliers will be evaluated based on the supplier RCOI evaluation process *M\_QA02\_HYP\_Supplier RCOI Evaluation*.



The Company provides a copy of its Code of Conduct to all its suppliers.

To support the improvement of supply chain transparency, the Company is a member of the Responsible Business Alliance.

Name      Mike Marracino  
 Title      Executive Vice-president, Procurement  
 Date      2019/12/10